



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSE GLUCKSMAN,  
aka "jjjqqq34,"

Defendant.

**2:24-CR-00579-JFW**

I N D I C T M E N T

[18 U.S.C. §§ 2252A(a)(2)(A),  
(b)(1): Distribution of Child  
Pornography; 18 U.S.C.  
§§ 2252A(a)(5)(B), (b)(2):  
Possession of Child Pornography;  
18 U.S.C. § 2253: Criminal  
Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about January 23, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as "jjjqqq34," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any

1 means, including by cellular phone, knowing that the image was child  
2 pornography.

3 The child pornography that defendant GLUCKSMAN distributed  
4 consisted of an image sent via the Wickr application with file name  
5 "BBC498CE-1480-49AF-8195-6F9D44E5306E.jpeg."  
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COUNT TWO

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about January 27, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as "jjjqqq34," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular phone, knowing that the image was child pornography.

The child pornography that defendant GLUCKSMAN distributed consisted of following files sent via the Wickr application:

1. "F0C37176-8351-4220-B9BF-3487D1C327B9.jpeg"
2. "IMG\_0120.JPG"

COUNT THREE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about February 21, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as ""jjjqqq34," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular phone, knowing that the image was child pornography.

The child pornography that defendant GLUCKSMAN distributed consisted of an image sent via the Wickr application with file name "IMG\_0144.JPG."

COUNT FOUR

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about April 27, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as ""jjjqqq34," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular phone, knowing that the image was child pornography.

The child pornography that defendant GLUCKSMAN distributed consisted of an image sent via the Wickr application with file name "IMG\_0022.JPG."

COUNT FIVE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about May 10, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as "jjjqqq34," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular phone, knowing that the image was child pornography.

The child pornography that defendant GLUCKSMAN distributed consisted of the following files sent via the Wickr application:

1. "2FB0CE4B-BECF-4029-AA27-05EBF126EEDC.jpeg"
2. "58017E6-2B41-4DD7-83A2-5EF1E49CA5D3.jpeg"
3. "BBBA4152-1E1B-4D6B-BB7D-28FA2F20722E.jpeg"
4. "E5E5CF88-1255-465A-A1B4-BD180B4D6B48.jpeg"
5. "A318CEDE-C69A-4DEF-91F9-D5FED55C61CE.jpeg"

COUNT SIX

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about July 31, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as "jjjqqq34," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular phone, knowing that the image was child pornography.

The child pornography that defendant GLUCKSMAN distributed consisted of the following files sent via the Wickr application:

1. "IMG\_0284.JPG"
2. "IMG\_0283.JPG"
3. "IMG\_0229.JPG"

COUNT SEVEN

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about August 1, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as "jjjqqq34," knowingly possessed an iPhone 13 Pro Max, Serial Number HKWWVDP9JK, which contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), at least one of which was involving a prepubescent minor and a minor who had not attained 12 years of age, and that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by the Internet, knowing that the images were child pornography.

The child pornography that defendant GLUCKSMAN possessed on his iPhone included, but was not limited to, the following file:  
"alisonbower4\_contactPhoto/ MD5: 4a8d43f36a18b95de67e7fd3579edd0c."



COUNT EIGHT

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about August 1, 2023, in Los Angeles County, within the Central District of California, defendant JESSE GLUCKSMAN, also known as "jjjqqq34" knowingly possessed an iPad, Serial Number GG7C23TYMF3Q, which contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), at least one of which was involving a prepubescent minor and a minor who had not attained 12 years of age, and that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by the Internet, knowing that the images were child pornography.

The child pornography that defendant GLUCKSMAN possessed on his iPad included, but was not limited to, the following files:

1. "trim.FF6DC2E9-08F2-4FC2-9F4E-99FAFBB3C726.MOV"
2. "5005.JPG/ MD5:d4755f6ed5585a9c4c00d43d2aa19d37"
3. "5005.JPG/ MD5:b4816e46465493e4ec3d57909e6ca30b"

FORFEITURE ALLEGATION

[18 U.S.C. § 2253]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 2253, in the event of the defendant's conviction of the offenses set forth in any of Counts One through Eight of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following property:

(a) All right, title, and interest in any visual depiction involved in any such offense, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received and involved in any such offense.

(b) All right, title, and interest in any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense.

(c) All right, title, and interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant, if so convicted, shall forfeit substitute property, up to

1 the total value of the property described in the preceding paragraph  
2 if, as the result of any act or omission of the defendant, the  
3 property described in the preceding paragraph, or any portion  
4 thereof: (a) cannot be located upon the exercise of due diligence;  
5 (b) has been transferred, sold to or deposited with a third party;  
6 (c) has been placed beyond the jurisdiction of the court; (d) has  
7 been substantially diminished in value; or (e) has been commingled  
8 with other property that cannot be divided without difficulty.

9  
10 A TRUE BILL

11  
12 /S/  
Foreperson

13  
14 E. MARTIN ESTRADA  
United States Attorney

15  
16 MACK E. JENKINS  
Assistant United States Attorney  
Chief, Criminal Division

17  
18 

19 SCOTT M. GARRINGER  
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Deputy Chief, Criminal Division

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25 LISA J. LINDHORST  
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General Crimes Section